

**BEFORE**  
**THE PUBLIC SERVICE COMMISSION**  
**OF SOUTH CAROLINA**  
**DOCKET NO. 1997-239-C**

In Re: )  
 )  
Proceeding to Establish Guidelines for an )  
Intrastate Universal Service Fund )  
\_\_\_\_\_ )

**RESPONSES OF BLUFFTON TELEPHONE COMPANY, INC., HARGRAY  
TELEPHONE COMPANY, INC., HOME TELEPHONE COMPANY, INC., HORRY  
TELEPHONE COOPERATIVE, INC., AND PBT TELECOM TO INTERROGATORIES  
OF THE SOUTH CAROLINA CABLE TELEVISION ASSOCIATION**

Bluffton Telephone Company, Inc., Hargray Telephone Company, Inc., Home Telephone Company, Inc., Horry Telephone Cooperative, Inc., and PBT Telecom (the “Companies”), pursuant to the South Carolina Rules of Civil Procedure and the South Carolina Public Service Commission's Rules of Practice and Procedure (S.C. Code of Regulations R. 103-800, *et seq.*), submits the following responses to the Interrogatories of the South Carolina Cable Television Association (“SCCTA”) served on January 12, 2004, as described and set forth below.

These responses are provided subject to and without waiving the objections made by the Companies in their original response provided on January 22, 2004. While the Companies continue to believe that the interrogatory requests seek information that is not relevant to this proceeding, the Companies are providing the following information subject to the objections and subject to the Protective Agreement entered into by and between the SCCTA and the Companies in this docket. A non-proprietary version is being publicly filed. Any party wishing to have access to the protected information should contact the undersigned counsel and execute an

appropriate protective agreement. The Companies reserve the right to object to use of any of the following information during the hearing in this matter on the grounds of relevancy, confidentiality, or otherwise. In addition, the Companies reserve the right to amend, supplement, or revise the objections to providing this information, and to assert additional objections, should the Companies discover additional grounds for objecting at any time prior to hearing.

## **RESPONSES**

### **INTERROGATORY NO. 1**

For each service for which you have reduced a rate and received USF funding since inception of the South Carolina USF, state the following:

- a) the minutes of use of such service for each year since 1997; and,
- b) the revenues received from the sale of such service for each year since 1997.

### **RESPONSE:**

See attached spreadsheets.

### **INTERROGATORY NO. 2**

For each company which has filed updated embedded cost studies in support of its application for additional USF funding provide the following information:

- a) the total amount of additional capital investment you have made since 1997;
- b) expenditures for each year since 1997, by USOA account, which were made to upgrade the network of the company;
- c) whether the company or any of its affiliates provide broadband service; and,
- d) whether the company or any of its affiliates provide cable television services or services similar to cable television services such as “digital entertainment services.”

**RESPONSE:**

(a) and (b): See attached spreadsheets.

(c): Each of the Companies provides broadband service, either directly or through affiliated companies.

(d): Each of the Companies provides services similar to cable television services such as “digital entertainment services,” either directly or through affiliates.

Substantive responses provided by Emmanuel Staurulakis, President, John Staurulakis, Inc., Seabrook, Maryland. All objections to the foregoing interrogatories were provided by the undersigned counsel.

Respectfully submitted this 5<sup>th</sup> day of March, 2004.

/s/

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COOPERATIVE, INC., AND PBT  
TELECOM

Columbia, South Carolina

**INTERROGATORY NO. 1**

**CONFIDENTIAL SPREADSHEETS**

**\*\*REDACTED\*\***